

KENNETH E. SAVAGE, JR.
SAVAGE VS FEDERAL EXPRESS

June 01, 2015

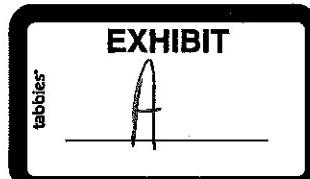
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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF TENNESSEE
3 MEMPHIS DIVISION

4 _____
5 KENNETH E. SAVAGE, JR.,)
6 Plaintiff,)
7 VS.) 2:14-cv-02057-STA-dkv
8 FEDERAL EXPRESS CORPORATION)
d/b/a FEDEX EXPRESS, FEDEX)
9 CORPORATION EMPLOYEES' PENSION)
PLAN, FEDEX CORPORATION)
10 RETIREMENT SAVINGS PLAN,)
11 Defendants.)
12 _____

13
14 VIDEOTAPE DEPOSITION
15 OF
16 KENNETH E. SAVAGE, JR.

17 JUNE 1, 2015
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1 STIPULATIONS
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3 The videotape deposition of Kenneth E.
4 Savage, Jr., is taken on this, the 1st day of June,
5 2015, on behalf of the Defendants, pursuant to
6 notice and consent of counsel, beginning at
7 approximately 9:25 a.m. in the offices of FedEx
8 Express, 3620 Hacks Cross Road, Building B, Third
9 Floor, Memphis, Tennessee 38125.

10 This deposition is taken pursuant to the
11 terms and provisions of the Federal Rules of Civil
12 Procedure.

13 The signature of the witness is waived.
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1 A P P E A R A N C E S
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20 ALSO PRESENT:
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22 Todd Davis, videographer
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25

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1 E X A M I N A T I O N I N D E X

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1 A Yes, sir.

2 Q When you moved to the day shift, did your
3 management structure change?

4 A I can't recall, but I seem to remember
5 Troy moved to day shift as well. And I believe I
6 retained Troy as my manager. I want to say that is
7 true --

8 Q Okay.

9 A -- to the best of my recollection.

10 Q That is fine.

11 Do you recall having any manager
12 other than Dana Jones or Troy Turnipseed as your
13 direct supervisor?

14 A Bill Sallas was my manager when I very
15 first got to the company, like, back in the 2001
16 timeframe. I think it was Bill Sallas.

17 Q Okay. And he was your manager from your
18 date of hire until --

19 A Until Dana Jones became a manager, I
20 think.

21 Q Okay. So if I look at your management
22 structure from the time you were hired until the
23 time you left the company, it would be Bill Sallas,
24 then Dana Jones, then Troy Turnipseed.

25 And to the best of your recollection

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1 as you sit here today, nobody else in terms of
2 direct managers. Is that right?

3 A No, sir. I can't remember anybody else.

4 Q Okay.

5 A Yes. That is correct.

6 Q That's correct. Okay. Thank you.

7 A Yes, sir.

8 Q I was wondering. You said you noticed
9 your pension wasn't the same as these other
10 individuals, and you can't remember who they were.
11 Right?

12 A Yes, sir.

13 Q And this is in the 2012 timeframe.

14 A Yes, sir.

15 Q How did you notice that your pension
16 wasn't the same as theirs?

17 A Through conversations.

18 Q Is that it?

19 A Yes, sir.

20 Q Did you review any documents?

21 A No, sir.

22 Q You didn't see their pension statements?

23 A No, sir.

24 Q Do you have access to any kind of
25 information like that on-line?

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1 manager over Troy Turnipseed and Matt Wickens and
2 that group. Is that right?

3 A He is the HR rep for our department.

4 Q Okay. So Tommy Lott is the HR
5 representative, would it be fair to say, for all the
6 aircraft mechanics on the avionics line?

7 A I believe that was his title. Yes, sir.

8 Q Okay. So he had HR responsibilities for
9 your entire group.

10 A Yes, sir.

11 Q But then, in terms of individual employees
12 or individual mechanics, there would be groups of
13 you that reported to certain managers. Right?

14 A Yes, sir.

15 Q Okay. Okay. Who did Troy Turnipseed and
16 Matt Wickens and Dana Jones and all of that group --
17 who did they report to?

18 A We had several senior managers at my time
19 at Avionics line. Mike Anello -- I think I am
20 pronouncing that correctly. He was the senior
21 manager towards the end of my tenure here.

22 And Maureen Patton or -- Patton, I
23 think. She had been the director of maintenance for
24 quite some time. And then my next person in my
25 chain-of-command was Scott Ogden and Greg Hall. And

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1 I think Larry Halp was above Mr. Hall, I believe.

2 And that is -- that is really -- as
3 far as management goes, that is all I know.

4 Q Okay. So that is your vertical
5 chain-of-command. Right?

6 A Yes, sir.

7 Q Okay. You say Mike Anello was your senior
8 manager there at the end.

9 A Yes, sir.

10 Q Who was your senior manager before Mike
11 Anello?

12 A Gosh. I can't remember his name.

13 Q You don't recall?

14 A I don't recall, sir.

15 Q That is fine.

16 A Patrick somebody. Patrick. I can't
17 remember his last name.

18 Q Okay. Well, if it comes to you later on,
19 just let me know.

20 A Yes, sir.

21 Q Going back to your Vanguard account, you
22 said it was wrong, too.

23 A Yes, sir.

24 Q What was wrong with your Vanguard account?

25 A Well, when we started, like I said,

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1 Pablo Melgar, and Will McGowans.

2 A Correct.

3 Q Okay. And we have already talked about
4 Alonzo Smith, and we have his deposition. Right?

5 A Right.

6 Q What do you know about Pablo Melgar?

7 A Pablo was actually -- at the time had
8 transferred to Miami. He and I went to college
9 together at Embry-Riddle while working at FedEx, and
10 I had heard that he had, you know, been in trouble
11 with the shipping violation.

12 And I called him immediately after
13 being suspended, and he basically told me that, you
14 know, he had been terminated back in May of 2012 for
15 a shipping violation -- shipping policy violation
16 and GFTed it on the second time and got his job
17 back.

18 And he basically told me that his
19 situation was he had an unauthorized use of his
20 shipping benefit and that that is the violation he
21 had.

22 Q Did he explain what kind of unauthorized
23 use?

24 A Yes. He told me that he had let a
25 girlfriend use his shipping account to ship some

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1 items, and that is what was called into question.

2 Q Any idea how many items he had shipped?

3 A It was several, but I don't think the
4 quantity was the issue. I think it was the fact
5 that he didn't -- he let somebody use his account.
6 That was the issue.

7 Q Okay.

8 A That is what he told me, and that is what
9 FedEx had told him, I think.

10 Q Was he in Miami at the time?

11 A Yes, sir.

12 Q Do you know who he reported to?

13 A Dana Jones.

14 Q So Dana Jones was in Miami in 2012?

15 A He had evidently gotten transferred down
16 there.

17 Q So everything you know about Pablo Melgar
18 is based on what he told you?

19 A Yes, sir.

20 Q Okay.

21 A He actually helped me with my GFT because
22 he had done two of them himself, and it hadn't been
23 but several months prior.

24 Q Okay.

25 A He was a really big help in explaining the

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1 C E R T I F I C A T E

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3 STATE OF TENNESSEE:
4 COUNTY OF SHELBY:

5 I, Takiyah Sanders, Court Reporter and
6 Notary Public, Shelby County, Tennessee, CERTIFY:

7 The foregoing proceedings were taken
8 before me at the time and place stated in the
foregoing styled cause with the appearances as
noted.

9 Being a Court Reporter, I then reported
10 the proceeding in Stenotype, and the foregoing pages
11 contain a true and correct transcript of my said
Stenotype notes then and there taken.

12 I am not in the employ of and am not
related to any of the parties or their counsel, and
I have no interest in the matter involved.

13 I FURTHER CERTIFY that this transcript is
14 the work product of this court reporting agency and
15 any unauthorized reproduction and or transfer of it
will be in violation of Tennessee Code Annotated
39-14-104, Theft of Services.

16 Witness my signature, this 14th day
17 of June, 2015.

18 

19 Takiyah Sanders, CSR, LCR
20 License No. 486

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